

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

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7   IN RE:

8   NATIONAL PRESCRIPTION OPIATE       MDL NO. 2804  
LITIGATION

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      This document relates to:           Case No. 17-MD-2804

10

      All cases                           Hon. Dan A. Polster

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13                   HIGHLY CONFIDENTIAL - SUBJECT TO  
14                   FURTHER CONFIDENTIALITY REVIEW

15                   VIDEOTAPED DEPOSITION OF:

16                   STEVE REARDON

17                   ALOFT BOSTON SEAPORT

18                   401-403 D Street

19                   Boston, Massachusetts

20                   November 30, 2018       9:03 a.m.

21

22                   Darlene M. Coppola

23                   Registered Merit Reporter

24                   Certified Realtime Reporter

1       what we're trying to do is prevent diversion,  
2       isn't it?

3           A.     Yes.

4           Q.     So if we have an order that we've  
5       determined is suspicious, we wouldn't want to give  
6       it to the people we think are placing the  
7       suspicious order, would we?

8                       MR. PYSER: Object to form.

9       BY MR. FULLER:

10          Q.     That wouldn't make sense?

11          A.     No.

12          Q.     We would want to do whatever due diligence  
13       we need to do to confirm that it is not a  
14       suspicious order before we ship it, correct?

15                       MR. PYSER: Object to form.

16          A.     Correct.

17       BY MR. FULLER:

18          Q.     Now, let's talk a little bit more about  
19       these ingredient limit reports. And I've heard  
20       you say several times today that these ingredient  
21       limit reports were approved by the DEA.

22                       Tell the jury who at the DEA approved  
23       these ingredient limit reports.

24          A.     I believe there's a letter out there by

1 Thomas Gitchel.

2 Q. Thomas who?

3 A. Gitchel.

4 Q. Can you help me out with the spelling of  
5 that last name?

6 A. G-i-t-c-h-e-l.

7 Q. And when was that letter sent?

8 A. It was around 1990.

9 Q. And in 1990, you believe some letter is  
10 out there that exists that says it's okay to  
11 provide the ingredient limit reports?

12 A. There was a collaboration between the DEA  
13 and the trade association to develop the report.

14 Q. You don't happen to have a copy of that  
15 letter, do you?

16 A. I do not.

17 Q. Because any communications between the DEA  
18 and Cardinal, there's been an order that that's  
19 supposed to be produced to the plaintiffs, and I  
20 have not seen that letter.

21 A. I --

22 MR. PYSER: Object to form.

23 BY MR. FULLER:

24 Q. Might that be one of those documents that